

Joseph W. Cotchett (36324)
Steven N. Williams (175489)
Adam Zapala (245748)
Elizabeth Tran (280502)
COTCHETT, PITRE & McCARTHY, LLP
840 Malcolm Road
Burlingame, CA 94010
Tel: (650) 697-6000
Fax: (650) 697-0577
jcotchett@cpmlegal.com
swilliams@cpmlegal.com
azapala@cpmlegal.com
etran@cpmlegal.com

*Interim Lead Counsel for the Indirect
Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE CAPACITORS ANTITRUST
LITIGATION**

Case Nos. 3:14-cv-03264-JD

**THIS DOCUMENT RELATES TO:
INDIRECT PURCHASER ACTIONS**

**DECLARATION OF STEVEN N. WILLIAMS
IN SUPPORT OF ADMINISTRATIVE
MOTION FOR APPOINTMENT OF
INTERNATIONAL PROCESS SERVER**

1 I, Steven N. Williams, hereby declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and am a partner
3 at Cotchett, Pitre & McCarthy, LLP, which serves as Interim Lead Counsel for the Putative
4 Indirect Purchaser Plaintiffs Class.

5 2. I submit this declaration to set forth facts in support of Indirect Purchaser Plaintiffs
6 Administrative Motion for Appointment of International Process Server, filed concurrently
7 herewith. Unless otherwise stated below, the matters stated herein are true to my own personal
8 knowledge, and if called as a witness, I could and would competently testify thereto.

9 3. On November 14, 2014, Indirect Purchaser Plaintiffs filed a Redacted version of
10 their First Consolidated Complaint (Dkt. No. 346), and served that complaint by email to counsel
11 of record.

12 4. On November 14, 2014 the Indirect Purchaser Plaintiffs entered a stipulation with
13 the Department of Justice, Defendants and the Direct Purchaser Plaintiffs, agreeing that pending
14 the Court's ruling on Plaintiffs' motions to seal and any motion filed by the United States,
15 counsel for Defendants would not share the unredacted versions of the consolidated complaints
16 with anyone except: (1) any outside counsel (and their employees) who are advising defendants
17 on the litigation; and (2) employees of the defendants who are in the legal department or its
18 equivalent (Dkt. No. 344).

19 5. On November 18, 2014, the Court granted the joint stipulation limiting service of
20 Indirect Purchaser Plaintiffs' First Consolidated Amended Complaint (Dkt. No. 362).

21 6. On November 24, 2014, the Court denied the Proposed Order to Seal Indirect
22 Purchaser Plaintiffs' First Consolidated Complaint Complaint (Dkt. No. 377).

23 7. On November 26, 2014, Indirect Purchaser Plaintiffs served Nissei Electric Co.,
24 Ltd., 1509-17 Okubo-Cho, Nishi-ku Hamamtsu-sh, Shizuoka-ken, 4328006, Japan, by FedEx
25 International Priority, tracking number 772008092592. On December 1, 2014, A.Yamada signed
26 for the delivery. To date, counsel for Nissei Electric Co., Ltd. has not appeared in this case.

27 8. Attached hereto as Exhibit 1 is a true and correct copy of the proof-of-delivery
28 from FedEx for service on Nissei Electric Co., Ltd.

1 On November 26, 2014, Indirect Purchaser Plaintiffs served Nitsuko Electronics Corp.,
2 203-1-1, Ogawara, Suzaka-shi, Nagano-ken, 3820071, Japan, by FedEx International Priority,
3 tracking number 772008204982. On December 1, 2014, M. Chiba signed for the delivery. To
4 date, counsel for Nitsuko Electronics Corp. has not appeared in this case, although they have
5 appeared in the Direct Purchaser case (Dkt. No. 598 and 599). Counsel for Nitsuko Electronics
6 Corp. is conferring with their client about this request.

7 9. Attached hereto as Exhibit 2 is a true and correct copy of the proof-of-delivery
8 from FedEx for service on Nitsuko Electronics Corp.

9 10. On November 26, 2014, Indirect Purchaser Plaintiffs served Toshin Kogyo Co.,
10 Ltd., 9F Tsukasa Bldg., 2-15-4, Uchikanda, Chiyoda-ku, Tokyo, Japan, by FedEx International
11 Priority, tracking number 772011393230. On November 28, 2014, Sakurai signed for the
12 delivery. To date, counsel has not properly appeared in this case.

13 11. Attached hereto as Exhibit 3 is a true and correct copy of the proof-of-delivery
14 from FedEx for service on Toshin Kogyo Co., Ltd.

15 12. Plaintiffs are unable to obtain a stipulation requesting this Court appoint Celeste
16 Ingalls as the authority and judicial officer competent under the jurisdiction of this Court to
17 forward to the Central Authority in the appropriate country any and all documents to be served in
18 this case on behalf of the Indirect Purchaser Plaintiffs due to the fact that there is no known
19 counsel for all of the defendants to be served.

20 I declare under penalty of perjury under the laws of the United States of America that the
21 foregoing is true and correct to the best of my knowledge.

22 Executed this 24th day of March, 2015 at Burlingame, California

23
24 /s/ Steven N. Williams
25 Steven N. Williams
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